

**Consultation Response from KC,
Lead Local Flood Authority**
2021/93567 Land off, Westgate, Cleckheaton, BD19 5DR
Erection of 194 dwellings with associated works
**Date Responded: 28th
November 2021**
**Responding Officer: Paul
Farndale**
Responding Ref:
Summary

This response provides a correction to our previous consultation response. After a re-examination of the flood zones we can see that the applicant has produced a layout that fits a 'sequential approach', i.e. all houses are positioned in flood zone 1.

However, given the regularity of flooding of SFRA zone 3ai, it would be unwise to position an attenuation tank here and we believe river flooding will diminish its value to surface water risk management as it will be regularly inundated from another source.

A discussion to fix the discharge rate and therefore determine the volume of attenuation is therefore critical in the decision of layout as the tank will need to be relocated. We estimate to avoid double counting of preserved landscaped areas, that a greenfield discharge restriction of 25l/s is appropriate for this site.

Kirklees Flood Management and Drainage as Lead Local Flood Authority OBJECT to this application on flood risk grounds.

- Proposed housing is located in SFRA flood zone 3ai and is not compliant with Kirklees Local Plan Policy. This is an avoidance tool to prevent developments in areas that would be classed as functional flood plain but a previous development has been located here. It is not Kirklees policy to allow risk mitigation in such areas, e.g., altering levels to suit, and is an outright rejection.
- Storage tanks placed in flood zones are vulnerable to being inundated from river flooding and therefore will not operate as designed.

Additional Comments

Surface water flood routing for the 1 in 100 event includes a through route via Iron Street. This is mentioned in the FRA and layout design and levels should clearly demonstrate that this route is maintained post development and avoids curtilage by using proposed roads and open space only.

This site is deemed unsuitable for infiltration SUDS, however water treatment options utilising SUDS should be considered such as swales.

A connection to watercourse should be sought. We agree with a discharge rate of 5l/s/ha but this must not include areas at the southern end of the site that remain greenfield otherwise this will mean these areas are double counted. Further analysis is required and the suggested FRA figure will need to be revised.

Flood routing. The road network on site and open space should be designed so flooding routing avoids property curtilage in blockage scenarios and exceedance events. There should be no basin features

causing standing water where reasonably practicable. We believe this site has the capacity to ensure the above.

The culverted section of watercourse should be removed and returned to open watercourse in line with Kirklees Local Plan Policy.

Liaison with Yorkshire Water is required over the existing public sewers located within the site, which require closing or diverting. We request the planning officer seeks information on manhole access points on old and new sewerage within flood zones and whether this will cause these systems to be inundated resulting in pollution. Alterations may therefore be required

A surcharged analysis of microdrainage simulation of the surface water design maybe required depending on the final agreed outfall location.